## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION
Case No. 1:17-MD-2804

APPLIES TO ALL CASES
Hon. Dan. A. Polster

## NOTICE OF FILING PREVIOUSLY UNDERSEAL DOCUMENTS – PLAINTIFFS' REPLY TO CARDINAL HEALTH'S OBJECTION TO DISCOVERY RULING NO. 14, PART 5, REGARDING PRIVILEGE AND CARDINAL'S DENDRITE AUDIT

Plaintiffs hereby provide notice of, and file into the public record, the attached unredacted brief and exhibits. Pursuant to the Order Regarding Redacting and Sealing of Documents (Doc. No. 2909), various confidentiality rulings, meet and confers between Plaintiffs, Defendants and third parties, and/or the resulting withdrawal of confidentiality designations, the attached previously redacted materials are hereby publicly filed as unredacted or less redacted. In the interest of clarity and completeness, Plaintiffs hereby file as public, the related brief and less redacted or unredacted exhibits referenced in same. Finally, for tracking and/or cross-referencing purposes, the below chart lists the original filing events related to the documents that are being filed, their prior ECF numbers, and the prior and present state of redactions.

Document Title	Ex. #	Prior Public ECF No.	Prior Redactions	Current Redactions
Plaintiffs' Reply to Cardinal Health's Objection to Discovery Ruling No. 14, Part 5, Regarding Privilege and Cardinal's Dendrite Audit		1547	Under Seal	None now
Email from Dendrite to Cardinal Health regarding Cegedim SOM Review, December 14, 2007	1	1547	Under seal	Fewer
Cardinal Health Email regarding training, December 15, 2007	2	1547	Under seal	Fewer

Email between Dendrite and Cardinal regarding SOM auditing, January 10, 2008	3	1547	Under seal	Fewer
Cardinal Health memo regarding retention of Cegedim, January 2008	4	1547	Under seal	Fewer
Cegedim ppt for Cardinal Health DEA Overview and Training	5	1547	Under seal	None now
Cardinal Health's, Supplemental Discovery Responses to Plaintiffs, November 30, 2018	6	1547	Under seal	Fewer
Cardinal Health's, Answers and Affirmative Defenses, Jan. 15, 2019	7	1547	Under seal <sup>1</sup>	None now
Cardinal Correspondence with the DEA, December 18, 2007	8	1547	Under seal	None now
Dendrite Invoice for Services	9	1547	Under seal	Fewer
Cardinal Email regarding Diversion Matter Expenses, January 8, 2008	10	1547	Under seal	None now
Cardinal QRA & Anti-Diversion, February 7, 2008	10a	1547	Under seal	None now
Cardinal Letter to DEA with Attachments, January 14, 2008	11	1547	Under seal	None now

Dated: December 17, 2019

## Respectfully submitted,

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<sup>&</sup>lt;sup>1</sup> But filed publicly at ECF No. 1256.

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17th day of December, 2019, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court's CM/ECF System.

/s/ Anthony D. Irpino
Anthony D. Irpino